

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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SHAWN RAVERT,	:	NO.: 4:20-cv-00889-WIA
Plaintiff	:	
v.	:	CIVIL ACTION – LAW
	:	
MONROE COUNTY;	:	
PRIMECARE MEDICAL, INC.;	:	JUDGE WILLIAM I. ARBUCKLE
GRACE RAMOS, LPN;	:	
KENNETH WLOCZEWSKI, D.O.;	:	<i>Electronically Filed</i>
PAULINA FOLEY, PA-C; and	:	
JOHN DOES 1-10;	:	
Defendants	:	JURY TRIAL DEMANDED

**STIPULATION OF COUNSEL FOR DISMISSAL OF  
INDIVIDUAL DEFENDANTS PURSUANT TO FED. R. CIV. P. 41**

The undersigned parties, by and through their respective counsel, hereby agree and stipulate pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) that all claims as asserted against individual Defendants Grace Ramos, LPN, Kenneth Wloczewski, D.O., and Paulina Foley, PA-C are hereby **DISMISSED WITH PREJUDICE**, without costs and each side bearing their own attorneys' fees. The claims against PrimeCare Medical, Inc. and Monroe County are not affected by this dismissal.

  
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Date: March 23, 2023

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 23<sup>rd</sup> day of March, 2023, the foregoing *Stipulation of Dismissal of Individual Defendants* was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to counsel of record, which service satisfies the requirements of the Federal Rules of Civil Procedure.

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By: s/John R. Ninosky  
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